

**IN THE DISTRICT COURT OF THE UNITED STATES  
WESTERN DISTRICT OF OKLAHOMA**

THOMAS H. BATES, )  
v. )  
Plaintiff, ) Case No. CIV-21-705-JD  
STATE FARM FIRE AND ) (District Court of Oklahoma  
CASUALTY COMPANY, ) County; Case No. CJ-2021-2627  
Defendant. )

**OFFER TO ALLOW JUDGMENT**

Defendant, State Farm Fire and Casualty Company, pursuant to Fed. R. Civ. P. 68 and 12 Okla.Stat. § 1101.1(B) hereby makes this Offer to Allow Judgment against it in the amount of \$50,000.00. This Offer is inclusive of all costs, attorney's fees and interest. This Offer is not an admission of liability and is being made solely in the interest of judicially economical resolution pursuant to Fed. R. Civ. P. 68 and 12 Okla.Stat. § 1101.1(B), with no other intended effect.



Respectfully submitted,

/s/ Paula M. Williams

Lance E. Leffel, OBA No. 19511  
Paula M. Williams, OBA No. 30772  
**GABLEGOTWALS**  
Fifteenth Floor  
One Leadership Square  
211 North Robinson  
Oklahoma City, OK 73102-7101  
(405) 235-5500  
(405) 235-2875 (fax)  
[lleffel@gablelaw.com](mailto:lleffel@gablelaw.com)  
[pwilliams@gablelaw.com](mailto:pwilliams@gablelaw.com)

*Attorneys for Defendant, State Farm Fire  
and Casualty Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2021, a true, correct and exact copy of the above and foregoing document was served by placing same in the United States mail, with proper postage thereon duly prepaid, to those parties as listed below:

Brad Miller, Esq.  
J. Logan Johnson, Esq.  
Shawna L. Landeros, Esq.  
Miller & Johnson  
500 NW 6th Street, Suite 300  
Oklahoma City, OK 73102  
*Attorneys for Plaintiffs*

s/Paula M. Williams

Paula M. Williams